

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 7

SYSCO GRAND RAPIDS, LLC,

Respondent/Employer,

and

GENERAL TEAMSTERS UNION LOCAL
NO. 406, INTERNATIONAL BROTHERHOOD
OF TEAMSTERS,

Cases: 07-CA-146820
07-CA-148609
07-CA-149511
07-CA-152332
07-CA-155882
07-CA-166479
07-RC-147973

Charging Party/Petitioner.

**CHARGING PARTY/PETITIONER’S OPPOSITION TO
RESPONDENT’S SECOND RENEWED MOTION TO REOPEN THE
RECORD FOR LIMITED PURPOSE OF PRESENTING EVIDENCE
OF CHANGED CIRCUMSTANCES**

Respondent filed its Second Renewed Motion to Request to Reopen the Record for Limited Purpose of Presenting Evidence of Changed Circumstances (“Motion”) on June 15, 2018. For the reasons set forth in Counsel for the General Counsel’s Opposition to Respondent Sysco Grand Rapids LLC’s Motion dated June 25, 2018, Charging Party/Petitioner opposes Respondent’s Motion and requests that the same be denied in its entirety. Additionally, Charging Party/Petitioner would point out that the credibility of Amy Campbell, who executed the Declaration of Amy Campbell attached to and upon which the Second Renewed Motion to Request to Reopen the Record is based, was found by Administrative Law Judge Michael A. Rosas to be severely wanting. See Footnote 12 on Page 6 and Footnote 62 on page 17 of the Decision in this matter dated March 2, 2017.

Dated: June 28, 2018

PINSKY, SMITH, FAYETTE & KENNEDY, LLP
Attorneys for Union

By Michael L. Fayette

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CERTIFICATE OF SERVICE

This is a to certify that on this 28th day of June, 2018, I filed a copy of the **Charging Party/Petitioner's Opposition To Respondent's Second Renewed Motion To Reopen The Record For Limited Purpose Of Presenting Evidence Of Changed Circumstances Brief of the Charging Party Union/Petitioner** with the Regional Director of Region Seven using the Board's E-Filing System, together with a copy of the same on the Counsel for the General Counsel and the Respondent/Employer's counsel of record via email as follows: Steve Carlson (steve.carlson@nrb.gov), Colleen Carol (colleen.carol@nrb.gov), William E. Hester, III, (WEH@kullmanlaw.com) and Mark A. Carter (Mark.Carter@dinsmore.com).

Michael L. Fayette

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